

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF SOUTH CAROLINA
 CHARLESTON DIVISION

TRADEMARK PROPERTIES,)	
INC., a South Carolina corporation;)	Civil Action No.2:06-CV-2195-CWH
RICHARD C. DAVIS, an individual)	
)	
Plaintiffs,)	
)	
vs.)	
)	
A&E TELEVISION NETWORKS,)	PLAINTIFF, TRADEMARK PROPERTIES,
a joint venture of the Hearst)	INC.'S, ANSWERS TO LOCAL RULE 26.01
Corporation, ABC INC. and NBC)	INTERROGATORIES
UNIVERSAL; DEPARTURE FILMS)	
an entity of unknown origin; and)	
DOES 1-20, inclusive)	
)	
Defendants.)	
-----)	
A&E TELEVISION NETWORKS,)	
)	
Counterclaim Plaintiff,)	
)	
vs.)	
)	
)	
TRADEMARK PROPERTIES, INC.)	
and RICHARD C. DAVIS,)	
)	
Counterclaim Defendants.)	
)	

(A). State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

None

(B) As to each claim, state whether it should be tried jury or nonjury and why.

The Plaintiff has requested a jury trial on all claims as the Plaintiff is seeking

a money judgment.

(C) State whether the party submitting these responses is a publicly owned company and separately identify:

- (1) each publicly owned company of which is a parent, subsidiary, partner, or affiliate;
- (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and
- (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

The Plaintiff is not a publicly owned company

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

The Defendants removed the case to the Charleston Division of the United States District Court for the District of South Carolina pursuant to 28 U.S.C §1332 (a)(1).

(E) Is this action related in whole or part to any other matter filed in this District, whether civil or criminal? If so, provide:

- (1) a shore caption and the full case number of the related action;
- (2) an explanation of how the matter are related; and
- (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

The Plaintiff is not aware of any at this time.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleadings reflecting the correct identification.

Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Not applicable.

CISA & DODDS, LLP

By: s/ Frank M. Cisa
Frank M. Cisa (Federal ID No. 138)
Cisa & Dodds, LLP
622 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29464
Phone: (843) 881-3700
Fax: (843) 881-2511
E-Mail: frank@cisadodds.com

Attorney for Plaintiffs

Mt. Pleasant, South Carolina

October 2, 2006

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY, that on this 2nd day of October, 2006 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such to the following:

Robert H. Jordan, Esquire
151 Meeting Street/ Sixth Floor
P.O. Box 1806 (29402)
Charleston, SC 29401-2239
robert.jordan@nelsonmullins.com
Attorney for Defendants

Richard Ashby Farrier, Jr., Esquire
151 Meeting Street/Sixth Floor
P.O. Box 1806 (29402)
Charleston, SC 29401-2239
raf@nmrs.com

Jeremy Feigelson, Esquire
Debevoise & Plimpton, LLP
919 Third Avenue
New York, NY 10022
jfeigels@debevoise.com

S. Zev Parnass, Esquire
Debevoise & Plimpton, LLP
919 Third Avenue
New York, NY 1002
szparnas@debevoise.com

s/ Frank M. Cisa

October 2, 2006
Charleston, SC